

**LOCAL BANKRUPTCY FORM 9013-4**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

William Harvey Goodling  
Kelly Jean Goodling

**CHAPTER** 13

**CASE NO.** 1 - 21 -bk- 01819-HWV

**Debtor(s)**

Commonwealth of Pennsylvania,  
Department of Revenue

**ADVERSARY NO.**    -    -ap-     
(if applicable)

**Plaintiff(s)/Movant(s)**

**vs.**

William Harvey Goodling  
Kelly Jean Goodling

**Nature of Proceeding:**   

Confirmation Hearing

**Defendant(s)/Respondent(s)**

**Document #:** 79

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.<sup>2</sup>

Reason for the continuance.

Undersigned counsel has a mandatory office retreat in Gettysburg, Pennsylvania on May 24 and May 25, 2022, which all attorneys with the Pennsylvania Office of Attorney General are required to attend. Accordingly, due to this mandatory office retreat, there are no other attorneys at the Pennsylvania Office of Attorney General that could appear on behalf of undersigned counsel. Additionally, debtors' counsel have noted that they have prior obligations throughout the month of June and early July, and, therefore, undersigned counsel respectfully requests that this matter's confirmation hearing be continued until mid-July.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: May 12, 2022



Attorney for PA Department of Revenue

Name: Brad G. Kubisiak

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<sup>1</sup> No alterations or interlineations of this document are permitted.